

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,

v.

AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00003-
LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,
v.
AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00004-
LTS

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,
v.
AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00005-
LTS

**[PROPOSED] SCHEDULING ORDER FOR DISCOVERY IN CONNECTION WITH
MOTIONS OF THE COMMONWEALTH OF PUERTO RICO, BY AND THROUGH
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, FOR PARTIAL
SUMMARY JUDGMENT**

Upon consideration of the *Joint Status Report of Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, the Bank of New York Mellon, U.S. Bank Trust National Association, and the Financial Oversight and Management Board for Puerto Rico, as Representative of the Commonwealth of Puerto Rico, Pursuant to the Court's January 20, 2021 Order* (the "Joint Status Report"),² which was filed in compliance with the *Order Regarding*

² Capitalized terms not otherwise defined herein have the meaning ascribed to them in the Joint Status Report.

Discovery in Connection with Motions of the Commonwealth of Puerto Rico, By and Through the Financial Oversight and Management Board, Pursuant to Bankruptcy Rule 7056 for Partial Summary Judgment Disallowing Claims (Adv. Proc. No. 20-00003, ECF No. 115; Adv. Proc. No. 20-00004, ECF No. 108; Adv. Proc. No. 20-00005, ECF No. 129) (the “Rule 56(d) Order”), the Court having found and determined that: (i) the Court has jurisdiction to consider the Joint Status Report and the proposed schedules presented therein pursuant to Section 306(a) of PROMESA; (ii) venue is proper before this Court pursuant to Section 307(a) of PROMESA; (iii) due and proper notice has been provided under the particular circumstances and no other or further notice need be provided; and (iv) after due deliberation and sufficient cause appearing; therefore, it is HEREBY ORDERED THAT:

1. The schedule for discovery authorized under the Rule 56(d) Order shall be as follows:

- Defendants shall serve initial document requests on the Government³ by **February 8, 2021**;
- The Parties shall file a joint status report by **March 4, 2021**;
- A status conference will be held on **March 9, 2021** [*or another date as soon thereafter as is convenient for the Court*];
- Defendants shall provide notice of any Rule 30(b)(6) deposition topics, for depositions directed to the Government, by **March 31, 2021**;
- The Parties shall file a further joint status report by **April 28, 2021**;

³ “Government” shall mean the Commonwealth of Puerto Rico, by and through the Financial Oversight and Management Board for Puerto Rico, and any instrumentality of the Commonwealth; it does not include any natural persons. Defendants and the Government shall collectively be referred to as the Parties. The deadlines herein for serving document requests and Rule 30(b)(6) deposition topics on the Government do not apply to requests served on nonparties that are not instrumentalities of the Commonwealth.

- The Government shall substantially complete its document production by **June 3, 2021**;
 - The Government shall complete its document production by **July 2, 2021**;
 - The Parties shall file a further joint status report by **July 8, 2021**;
 - A status conference will be held on **July 12, 2021** [*or another date as soon thereafter as is convenient for the Court*]; and
 - The date for completing the discovery authorized under the Rule 56(d) Order is **August 3, 2021**.
2. Responses and objections to any written discovery requests shall be due within fourteen (14) days of service of such requests.
 3. Written discovery requests, and responses and objections thereto, may be served on the Parties via e-mail. Federal Rule of Civil Procedure 6(d) shall not apply to service of any papers by email during the pendency of discovery authorized under the Rule 56(d) Order.
 4. If any party requests a meet-and-confer during the pendency of discovery authorized under the Rule 56(d) Order, such meet-and-confer shall occur within five (5) calendar days of the request.

SO ORDERED.

Dated: _____, 2021

HON. JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE